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December 17, 1997

**BY FACSIMILE**

Ms. Magalie Romas Salas  
Secretary  
Federal Communications Commission  
1919 M Street, N.W., Stop Code -1170  
Washington, D.C. 20554

Re: MM Docket 87-268

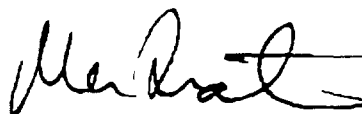
Dear Ms. Salas:

Transmitted herewith is an original and four copies of the Comments of Bell Broadcasting, L.L.C., in connection with the above-referenced matter.

If any questions should arise during the course of your consideration of this matter, it is respectfully requested that you communicate with this office.

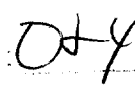
Very truly yours,

BROOKS, PIERCE, McLENDON,  
HUMPHREY & LEONARD, L.L.P.



Marcus W. Trathen

Enclosure



**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of	)	
	)	
Advanced Television Systems	)	MM Docket No. 87-268
and Their Impact upon the	)	
Existing Television Broadcast	)	
Service	)	

**COMMENTS OF BELL BROADCASTING, L.L.C.**

Bell Broadcasting, L.L.C., by and through its undersigned counsel, submits these Comments in response to the *ex parte* submission of Maximum Service Television ("MSTV"), filed on November 20, 1997, in the above-referenced docket.

Bell Broadcasting is the licensee of Station WUPV(TV), Channel 65, Ashland, Virginia. Under the Commission's current DTV allocation, WUPV(TV) will be assigned DTV Channel 47. In its *ex parte* submission, MSTV proposed to change WUPV(TV)'s DTV Channel 47 assignment to Channel 52 and assign DTV Channel 47 to WLRH(TV), Richmond, instead of Bell Broadcasting.

As stated more fully in the attached Engineering Statement of Kevin T. Fisher, Bell Broadcasting opposes MSTV's proposal to reallocate Channel 47 because the MSTV proposal would assign Bell Broadcasting a DTV channel outside the core spectrum. For the reasons stated in the attached Engineering Statement, Bell Broadcasting respectfully requests that the Commission deny MSTV's *ex parte* proposal to reassign DTV Channel 47.

Dated: December 17, 1997

BELL BROADCASTING, L.L.C.

By:



Mark J. Prak  
Marcus W. Trathen

Its Attorneys

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ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of BELL BROADCASTING, L. L. C. ("Bell"), licensee of Television Station WUPV(TV), Channel 65, Ashland, Virginia, in support of its response to the *ex parte* submission of November 20, 1997, filed by Maximum Service Television, Inc. ("MSTV"), regarding the FCC's digital television (DTV) table of assignments.

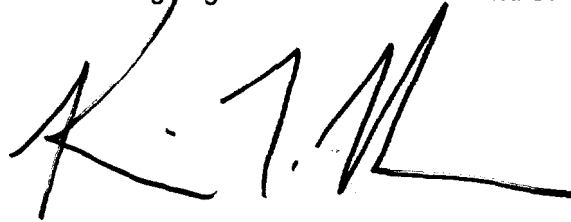
The FCC, in its *Sixth Report and Order* regarding DTV assignments (MM Docket No. 87-268), proposed the assignment of DTV Channel 47 to WUPV. Bell did not oppose this allocation. In its submission, MSTV proposes to modify the FCC's table of DTV assignments in order to ameliorate interference caused by DTV-to-DTV first-adjacent-channel shortspacings in various parts of the United States. In doing so, MSTV proposes to change WUPV's DTV Channel 47 assignment to Channel 52 and assign DTV Channel 47 to WLRH, Richmond, instead of to WUPV. In its assignment table, the FCC allotted DTV Channel 26 to WLRH, and it was to avoid first-adjacent-channel interference to the operation of WTVR-TV, DTV Channel 25, Richmond, that MSTV proposed to give DTV Channel 47 to WLRH, instead.

Bell opposes this suggested change, since the new DTV channel for WUPV proposed by MSTV is outside the core spectrum (Channels 7-51), whereas the FCC's proposed DTV channel is within the core spectrum. Since WUPV's present NTSC channel is also outside the core spectrum, implementation of MSTV's proposal would involve WUPV's making a costly DTV channel change following the transition period.

Bell supports the need to make revisions to the DTV table of assignments in order to cure DTV-to-DTV first-adjacent channel interference. However, Bell requests that it be permitted to keep its Channel 47 DTV allocation and suggests that the DTV allotment of WLRH or

WTVR-TV be changed to Channel 52, or some channel other than 47, in order to cure this problem.

I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge and belief.

A handwritten signature in black ink, appearing to read 'K. T. Fisher', with a stylized, sweeping flourish at the end.

KEVIN T. FISHER

December 15, 1997